

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of:

Request for Review)	
of the Decision of the)	
Universal Service Administrator by)	
)	
Santa Fe Indian School and)	
Integrity Networking Systems, Inc)	CC Docket No: 02-6
)	
)	
Schools and Libraries Universal Service)	File No. SLD- 382920
Support Mechanism)	
)	
Wireline Competition Bureau)	

REQUEST FOR REVIEW OR WAIVER

INTRODUCTION

Section 54.719(c) of the Commission’s rules provides that any person aggrieved by an action taken by a division of the Universal Service Administrative Company (“USAC”) may seek review from the Commission.¹ Accordingly, Integrity Networking Systems, Inc. (“Integrity”) [SPIN: 143008507], on behalf of itself and the Santa Fe Indian School (“SFIS”) [BEN: 99297], hereby appeals the September 8, 2010 decision of USAC not to pay Integrity’s Form 474 invoice (“SPI”) for eligible services provided to SFIS under FRN 1055612, a Funding Year 2003 commitment.

By mistake, SFIS cancelled FRN 1055612 via the Form 500 process. Because of the school’s inadvertent error, USAC now refuses to pay Integrity’s SPI. According to USAC, the decision to cancel a funding commitment via the Form 500 process is “irrevocable,” even where, as here, there is no dispute that the applicant cancelled the

¹ 47 C.F.R. § 54.719(c).

FRN by mistake. USAC is incorrect. The Commission has already ruled that Form 500 funding commitment cancellations are revocable. More specifically and to the point, the Commission has ruled that they are revocable where, exactly like here, the cancellation resulted from an inadvertent error. *Request for Review of Joseph Jignoli & Son, Inc.* (“*Jignoli & Son Order*”)²

BACKGROUND

This is not the first time that this SPI has been before the Commission. The Commission ruled on it once before in the *Alton Community Unit School District 11 Order* (“*Alton Order*”).³ There, the Commission ordered USAC to pay it (along with numerous other service providers’ invoices), so long as payment was otherwise warranted. As soon as Integrity received the Commission’s decision, it looked online for up to date information about the FRN. It was astonished to discover that the account balance was zero. So it began to investigate

Integrity learned that while its appeal was pending before the Commission, SFIS had decided to cancel this FRN via the Form 500 process. SFIS’ IT Coordinator, Kimball Sekaquaptewa, had decided to cancel the FRN 1055612 after she had read in a USAC News Brief about how important it was to return unused funds and what the consequences might be for not doing so. (See Exhibit A, Declaration of Kimball Sekaquaptewa (“Declaration”) at paras. 5-7). At that time, unfortunately, Ms. Sekaquaptewa had not received any information about the appeal being filed. Thus she was completely unaware that an appeal involving this particular FRN was pending at the Commission, and that Integrity, therefore, was still actively seeking payment from USAC. (See Declaration at paras. 10-12). In other words, she was reasonably, but nevertheless mistakenly, under the impression that Integrity had abandoned all hope of

² *Requests for Review of the Decisions of the Universal Service Administrator by Joseph Jignoli & Son, Inc., et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-475364, et al., CC Docket No. 02-6, DA 07-4471 (Wireline Comp. Bur. 2007).

³ *Requests for Review of the Decisions of the Universal Service Administrator by Alton Community Unit School District 11, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-518052, et al., CC Docket No. 02-6, DA 10-999 (Wireline Comp. Bur. 2010).

USAC ever paying this SPI. She believed, therefore, that to be a good E-rate citizen and to ensure that SFIS did not violate program rules, SFIS had to return this funding commitment to USAC. If she had known about the pending appeal, however, she would not have included FRN 1055612 in SFIS' Form 500. (*See* Declaration at para. 14).

When Integrity and SFIS learned, respectively, about their unfortunate misunderstanding and what had happened as a result, they immediately began cooperating to get the Form 500 cancellation reversed. To do this, Integrity knew that it first had to get the process started, so it decided to resubmit the SPI. It did not take long for USAC to refuse payment again, but this time because the FRN had been cancelled. An appeal to USAC followed with a request to reverse the Form 500 cancellation and to process Integrity's SPI in accordance with the Commission's *Alton Order*. *See* Exhibit B. On September 8, 2010, USAC denied the appeal, noting very simply that Form 500 funding commitment cancellations are irrevocable. *See* Exhibit C. This is the relevant part of that decision:

<u>Funding Request Number(s):</u>	1055612
Decision on Appeal:	Denied
Explanation:	

- Currently, no funds are committed for FRN 1055612. There are no funds available as the applicant filed a Form 500, an irrevocable action, thus rescinding all funds associated with this FRN, therefore the appeal is denied.

DISCUSSION

○ USAC Ignored Commission Precedent

USAC's decision not to abrogate a Form 500 cancellation that an applicant obviously filed by mistake is directly at odds with clear and unambiguous Commission precedent. The Commission has already made it quite plain that Form 500 funding commitment cancellations may be revoked. In the *Jingoli and Son Order*⁴, the

⁴ *Requests for Review of the Decisions of the Universal Service Administrator by Joseph Jignoli & Son, Inc., et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-475364, *et al.*, CC Docket No. 02-6, DA 07-4471 (Wireline Comp. Bur. 2007).

Commission reviewed 13 cases involving decisions by USAC to deny E-rate funding on the grounds that the petitioners had sought to cancel their funding commitments via Form 500s and other means. In every case, the central issue was the same. It was not whether the cancellations had been sought, but rather, why they had been sought. Although the reasons varied from case to case, the Commission found and focused on the common thread that tied them all together, namely, one kind of inadvertent mistake or another that ultimately led to the cancellation. Those kinds of minor errors, the Commission decided, do not warrant the rejection of E-rate funding requests.⁵

The reason SFIS' IT Coordinator cancelled FRN 1055612 was because she was doing her best to "do the right thing." At USAC's encouragement, she was returning funding commitments that she reasonably believed SFIS no longer needed or could use. At the time, Ms. Sekaquaptewa thought that this FRN belonged in the latter category because she assumed that funding for it had been irretrievably lost. She did not discover, unfortunately, until after she had already filed the Form 500 that this FRN was still very much alive. Ms. Sekaquaptewa explains this in her *Declaration* (Exhibit A). She also makes it clear that she would not have included this FRN in the Form 500 if she had known what its actual status was at the time. This is exactly the kind of inadvertent mistake that the Commission, in the *Jingoli & Sons Order*, instructed USAC not to use as a sword to cut off applicants from the E-rate funding they so badly need.

○ **There is Evidence that USAC's Approach to FRN Cancellations is Inconsistent**

We believe that USAC's contention that decisions to cancel FRNs are irrevocable may not even be consistent with its own line of administrative actions. By examining USAC's public database, we discovered two instances, for example, and there may be more, where it appears that USAC may have reversed an applicant's decision to cancel one of its FRNs. *See* Exhibit D.

After USAC cancelled FRN 1055612 here, it added an entry into its public database that showed the FRN account balance at zero, and that is the way it appears

⁵ *Id* at para. 4.

today. In the two cases we found, first we noticed similar entries zeroing out the account balances. Then, to our surprise, we saw USAC fully restoring the account balances in later entries. Because we do not have access to USAC's files and we have no direct evidence to go on, of course we cannot say with certainty that these changes resulted from USAC restoring funding to FRNs that had been cancelled in error, but that is certainly one very reasonable explanation for those unusual database entries. Therefore, we urge the Commission to question USAC about the two FRNs we noted and generally about its practices in this regard.

○ **USAC'S Decision Conflicts With the Commission's *Alton Order***

In the *Alton Order*, the Commission ordered USAC "to accept each invoice [including Integrity's SPI] as timely filed and disburse funding..."⁶ The Commission further found "that complete rejection of these invoices is not warranted, given that the applicants missed a USAC procedural deadline and did not violate a Commission rule" and that the School and service provider had "demonstrated that they made good faith efforts to comply with programmatic rules".⁷

It is important to keep in mind that if USAC had paid Integrity's SPI in the first place, no appeal to the Commission would have been necessary. If that had been the case, Ms. Sekaquaptewa would not have had any reason to include this FRN along with the others on the Form 500 she prepared. Therefore, by using SFIS' inadvertent Form 500 cancellation as an excuse for not paying Integrity's SPI after the *Alton Order*, what USAC actually is doing is penalizing SFIS and Integrity for its own refusal to process the SPI the first time around. Indeed, but for USAC's initial refusal to pay, which the Commission was supposed to have remedied in the *Alton Order*, we would not be before the Commission today asking it to decide one more time whether an applicant may revoke an FRN via the Form 500 process.

⁶ *Alton Community Unit School District 11, et.al Order*, DA 10-999, para. 1.

⁷ *Alton Community Unit School District 11, et.al Order*, DA 10-999, para. 6.

In the *Alton Order*, the Commission instructed USAC to pay Integrity's SPI unless it could support a good reason for not doing so.⁸ Not paying this SPI because of a Form 500 cancellation request that (1) SFIS would never have filed if Integrity had not been forced to ask the Commission for help in getting it paid in the first place; and (2) was filed inadvertently because of an unfortunate, but reasonable misunderstanding about the status of the FRN and a desire to follow program rules, is not a good reason for refusing to do so. Thus, contrary to the Commission instructions to USAC in its *Alton Order*, we submit that USAC has not with respect to this SPI articulated a good, supportable reason for denial.⁹ Therefore, in accordance with the *Alton Order*, the Commission should instruct USAC to pay it now.

Irrevocability of Form 500 Discourages Applicants from Returning Funds

If, as USAC suggests, an applicant's decision to return unused E-rate funds via the Form 500 process actually is irrevocable, then such a rule will have a chilling affect on applicants. It will discourage them from ever deciding to return unused funds in this fashion voluntarily. To risk losing funds because of an inadvertent error would create an intolerable risk that most applicants, we believe, will not accept and that the Commission should not ask them to accept. As good shepherds of the E-rate program, it is an applicant's responsibility to return unused funds, but if doing so creates a risk of lost funding if funds are mistakenly returned, then the responsibility creates an undue and unfair burden on the applicant.

REQUEST FOR WAIVER

With respect to waiving its rules, the Commission has stated:

A rule may be waived where the particular facts make strict compliance inconsistent with the public interest.¹⁰ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual

⁸ *Alton Community Unit School District 11, et.al Order*, DA 10-999, see footnote 3 of the *Order*. The Commission also advised USAC that the applicant should be provided every ground for denial.

⁹ Note that USAC's denial of the July 2010 invoice did not actually include any reference to the SFIS Form 500 or to the fact that the funding request had a zero balance. Integrity had to contact SFIS to discover that a Form 500 cancelling the FRN had been filed.

¹⁰ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

basis.¹¹ In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.¹²

In the alternative, therefore, if the Commission determines that it cannot grant this request for review, we respectfully request that the Commission waive its rules and instruct USAC to pay Integrity's SPI. If USAC had paid this SPI when Integrity submitted it the first time, Integrity would not have had to appeal that decision to the Commission, the invoice never would have become one of the subjects of the *Alton Order*, and FRN cancellations via the Form 500 process would never have become an issue. We believe strongly that all of the facts, circumstances, procedural history, and important policy considerations that we have already discussed provide a solid foundation for waiver, should that be the only remedy available.

Respectfully submitted
on behalf of Integrity Networking Systems, Inc. and Santa Fe Indian School,

/s/ Glenn Perkal

Glenn Perkal, Vice-President
Integrity Networking Systems, Inc.
(505) 563-4903
gperkal@integrityns.com

cc: Kimball Sekaquaptewa, IT Coordinator
Santa Fe Indian School
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kimball@sfis.k12.nm.us

¹¹*WAIT Radio v. FCC*, 418 F.2d 1153, 1157, (D.C. Cir. 1969), *affirmed by WAIT Radio v. FCC*, 459 F.2d 1203 (D.C. Cir. 1972).

¹²*Northeast Cellular*, 897 F.2d at 1166.

Exhibit A

DECLARATION OF KIMBALL SEKAQUAPTEWA

I, Kimball Sekaquaptewa, hereby declare and affirm that the following statements are true and correct.

1. I am over 18 years of age and competent to testify to the matters described herein.
2. I have been employed as the IT Department Coordinator for the Santa Fe Indian School ("School") since the fall of 2006.
3. I have also been the School's designated E-rate specialist since that time. In that capacity, I am responsible for, among other things, preparing and maintaining all of the School's E-rate-related forms.
4. While executing my responsibilities as the School's E-rate specialist, I researched SLD recommended E-rate document organization, reviewed E-rate audit procedures and best practices, along with other information on the School and Library Division's ("SLD") website, and read the SLD's weekly news briefs, which I received via email.
5. From the SLD's March 14, 2008 News Brief, which focused on audits, I learned that applicants had a legal obligation to return unused funding commitments. The News Brief explained that "[a]n audit finding identifies a program rule violation," and then went on to list "[e]xamples of program rule violations." This was one of the violations it listed: "An applicant did not file a Form 500 to return an unused commitment to USAC." At that time, I was unaware that the School had any unused commitments.
6. Later, when I started using Funds For Learning's E-rate Manager® service, which enables users to view easily the status of a school's funding requests over several funding years, I discovered that the School had unused funding commitments from previous years.
7. Consequently, I prepared a Form 500 to return the School's unused funding commitments, and I filed it with the SLD on March 5, 2009.
8. In that Form 500, I returned every unused commitment related to every one of the School's service providers, except for those related to Integrity Networking Systems, Inc. ("Integrity Networking").
9. I returned only one of Integrity Networking's funding commitments. It was FRN 1055612. I returned only that one because I had reason to believe that the company was still interested in all of the others. My


understanding was that the company was still trying to recover funds from USAC under those FRNs.

10. On the other hand, I believed at the time that Integrity Networking had given up its interest in FRN 1055612, and that is why I included that FRN in the Form 500.
11. I believed that Integrity Networking had given up its interest in FRN 1055612 because I had assisted the company to seek reimbursement for it, which was denied. To the best of my recollection, that occurred during the summer of 2007. Between then and March 2009, when I was preparing the Form 500, I did not hear anything further from Integrity Networking or anyone else about that FRN. Consequently, I assumed that the company no longer had any interest in pursuing the matter. That is why I included FRN 1055612 in the Form 500.
12. At the time I filed the School's Form 500, I was unaware that Integrity Networking either had already, had any interest in, or was about to file an appeal with the Commission in connection with FRN 1055612.
13. I learned about the appeal for the first time after the Commission issued its decision in which it instructed USAC to process the invoice that the company had submitted against that FRN.
14. If, at the time I was preparing the Form 500, I had any idea that Integrity Networking was even considering an appeal to the Commission, I would have handled FRN 1055612 differently. I would have handled it exactly the same way I did every other one of the company's FRNs: I would not have included it in the Form 500.


SIGNATURE OF KIMBALL SEKAQUAPTEWA

10/22/10
DATE

WITNESS:

Signature: 

Print Name: Arthur Eberiel

Date: 10/22/2010

Exhibit B

August 6, 2010

via e-mail: appeals@sl.universalservice.org

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
100 South Jefferson Road
PO Box 902
Whippany, NJ 07981

LETTER OF APPEAL
Invoice Denial and Form 500 Cancellation

Applicant:	Integrity Networking Solutions
SPIN Number:	143008507
Filed on Behalf of:	Santa Fe Indian School
Billed Entity Number:	99297
Form 471 Application No.:	382920
Funding Year:	2003
FRN Number:	1055612

INTRODUCTION

Integrity Networking Solutions (Integrity) on behalf of Santa Fe Indian School (SFIS) hereby appeals the current action taken by the Schools and Libraries Division (SLD) in the following case.

BACKGROUND

On June 2, 2010, the FCC issued the *Alton Community Unit School District 11, et.al. Order*.¹ As part of this decision, the SLD was ordered to go back and pay invoices previously submitted and to accept the invoices as being timely filed. Integrity and SFIS were included as part of the *Alton Community Order* in reference to an invoice reimbursement Integrity filed for FRN 1055612 for Funding Year 2003. Upon learning of the FCC decision, Integrity resubmitted a Form 474 SPI for reimbursement, as

¹ *Requests for Review of the Decisions of the Universal Service Administrator by Alton Community Unit School District 11, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-518052, et al., CC Docket No. 02-6, DA 10-999 (Wireline Comp. Bur. 2010).

Integrity was unsure if a new Form 474 request for reimbursement was necessary. The SLD denied payment on the SPI filed by Integrity on July 7, 2010. A copy of the SPI denial is attached as Exhibit B.

Once Integrity received the SPI denial, it was discovered that SFIS has filed a Form 500 to cancel FRN 1055612. A copy of the Form 500 is attached as Exhibit C. SFIS filed the Form in an effort to return a number of unused funds from the 2003 Funding Year. The School mistakenly included FRN 1055612 as part of the Form when it was prepared and filed March 2009.²

DISCUSSION

The SLD Does Have a Precedent for Reversing Form 500 Cancellations

Integrity and SFIS have learned of other cases where the SLD has on its own accord reversed a Form 500 request to reduce or cancel an FRN based off the applicant letting the SLD know that the Form was mistakenly filed. As with those cases, the School mistakenly included FRN 1055612 on a Form 500 to either cancel or reduce funding to 21 different FY2003 funding requests. The Form was filed March 5, 2009, without the service provider's knowledge. The School had no reason to learn of their mistake until the appeal was granted by the FCC and Integrity attempted to file an invoice against the FRN for payment. The School now has learned of the mistake and is requesting the SLD reverse the request and allow the service provider to seek reimbursement.

Denying the Invoice Payment Goes Against the FCC's Order

Based off the FCC order, the SLD refusal to pay the Form 474 goes against the FCC's intent as stated in the *Alton Community Unit School District 11, et.al Order*. As part of the FCC order, USAC was ordered "to accept each invoice as timely filed and disburse funding..."³ The FCC further found "that complete rejection of these invoices is not warranted, given that the applicants missed a USAC procedural deadline and did not violate a

² A copy of the Form 500 filed by Santa Fe Indian School (SFIS) is attached as Exhibit C.

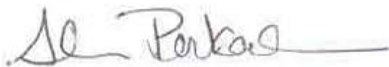
³ *Alton Community Unit School District 11, et.al Order*, DA 10-999, para. 1.

Commission rule” and that the School and service provider had “demonstrated that they made good faith efforts to comply with programmatic rules”.⁴ Denying payment of the invoice goes against the intent of the FCC’s Order and does not comply with the FCC’s order that in the event the SLD denies payment, the applicant should be provided every ground for denial.⁵ In the current case, the denial of the July 2010 invoice did not include any reference to the Form 500 or to the fact that the funding request had a zero balance. The service provider had to contact the School and discover on their own that a Form 500 cancelling the FRN had been filed.

SUMMARY

Integrity respectfully requests the SLD reverse the Form 500 cancelation as it applies to FRN 1055612 and provide Integrity with an opportunity to seek reimbursement against this FRN as ordered by the FCC.

Respectfully,



Glenn Perkal, Vice-President
Integrity Networking Systems, Inc.
On Behalf of Santa Fe Indian Schools
(505) 563-4903
gperkal@integrityns.com

⁴ *Alton Community Unit School District 11, et.al Order*, DA 10-999, para. 6.

⁵ *Alton Community Unit School District 11, et.al Order*, DA 10-999, see footnote 3 of the *Order*.

Exhibit C



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2003-2004

September 08, 2010

Verlyne Jolley
Funds for Learning
501 South Coltrane Road
Suite 100
Edmond, OK 73034

Re: Applicant Name: SANTA FE INDIAN SCHOOL
Billed Entity Number: 99297
Form 471 Application Number: 382920
Funding Request Number(s): 1055612
Decision Letter Date: March 19, 2009
Date Appeal Postmarked: August 09, 2010
Your Correspondence Dated: August 06, 2010

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Remittance Statement for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1055612
Decision on Appeal: **Denied**
Explanation:

- Currently, no funds are committed for FRN 1055612. There are no funds available as the applicant filed a Form 500, an irrevocable action, thus rescinding all funds associated with this FRN, therefore the appeal is denied.

If you believe there is a basis for further examination of your application, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be POSTMARKED within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to:

FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Verlyne Jolley
Funds for Learning
501 South Coltrane Road
Suite 100
Edmond, OK 73034

Billed Entity Number: 99297
Form 471 Application Number: 382920
Form 486 Application Number:

Exhibit D

Date	Event
05/05/2010	Changes to FRN 1615133- Status Text changed to 'MR1: The product/service substitution submitted has been reviewed and approved. MR2: The annual non-recurring (one-time) amount was modified from \$501,252.00 to \$500,400.00 to agree with the applicant documentation.'
05/05/2010	Changes to FRN 1615133 Status Text changed to 'MR1: The product/service substitution submitted has been reviewed and approved. MR2: The annual non-recurring (one-time) amount was modified from 501252.00 to 500400.00 to agree with the applicant documentation.'
04/29/2010	Changes to FRN 1615133 - Status Text changed to "
02/27/2010	FRN 1615133 removed from FRN Extension table
11/03/2009	Changes to FRN 1615133 - Authorized Disbursement Amount changed to '\$405,324.00'
10/01/2009	Changes to FRN 1615133 - Contract Expiration Date changed to '09/30/2009'
08/25/2009	Changes to FRN 1615133 Status Text changed to 'MR1: The product/service substitution submitted has been reviewed and approved. MR2: The annual non-recurring (one-time) amount was modified from \$501,252.00 to \$500,400.00 to agree with the applicant documentation.'
05/12/2009	Changes to FRN 1615133 - Payment Method changed to 'SPI'
01/29/2009	Changes to FRN 1615133 - Status Text changed to "
12/10/2008	Changes to FRN 1615133 Status Text changed to 'MR1: The product/service substitution submitted has been reviewed and approved. MR2: The annual non-recurring (one-time) amount was modified from \$501,252.00 to \$500,400.00 to agree with the applicant documentation.'
11/27/2008	Changes to FRN 1615133 - Form 486 Service Start Date changed to '07/01/2007' - 486 Acceptance Date changed to '11/27/2008'
11/07/2008	Changes to FRN 1615133 Status Text changed to 'MR1: The product/service substitution submitted has been reviewed and approved. MR2: The annual non-recurring (one-time) amount was modified from \$501,252.00 to \$500,400.00 to agree with the applicant documentation.' Wave Number changed to 46 Appeal Wave Number changed to 'A22' Months of Service changed to '12.00' Total One Time Cost changed to '\$500,400.00' Estimated One Time Cost changed to '\$500,400.00' Status changed to 'FUNDED' Estimated Annual Cost changed to '\$500,400.00' Requested Amount changed to '\$405,324.00'
11/04/2008	Changes to FRN 1615133 Wave Number changed to " Status changed to 'PENDING' Service Provider Name changed to 'More Than Computers, Inc'
07/23/2008	Changes to FRN 1615133 Committed Amount changed to '\$0.00' Months of Service changed to '0.00' Total One Time Cost changed to '\$0.00' Estimated One Time Cost changed to '\$0.00' Status changed to 'NOT FUNDED' Estimated Annual Cost changed to '\$0.00'
04/16/2008	Changes to FRN 1615133 Committed Amount changed to '\$406,014.12' FCDL Date changed to '04/15/2008' Wave Number changed to '46' Months of Service changed to '12.00' Total One Time Cost changed to '\$501,252.00' Estimated One Time Cost changed to '\$501,252.00' Status changed to 'FUNDED' Estimated Annual Cost changed to '\$501,252.00'
04/11/2008	Changes to FRN 1615133 - Last Date to Invoice changed to '01/28/2010'
04/10/2008	FRN 1615133 added to FRN Extension table
07/19/2007	Changes to FRN 1615133 - Service Start Date changed to '07/01/2007'
02/08/2007	FRN 1615133 added to E-rate Manager from SLD Data



Source: [E-rate Manager](#)

E-RATE MANAGER is a registered trademark of Funds For Learning, LLC
Data generated on Thursday, October 21st, 2010 at 11:45 AM CDT